



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



287703

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

January 16, 2008

L. Chase Fortenberry, P.G.
Environmental Engineer II
Georgia-Pacific LLC
133 Peachtree St, N.E.
P.O. Box 105605 (30348)
Atlanta, GA 30303

RE: Allied Paper/ Portage Creek/ Kalamazoo River Site
Georgia-Pacific Kalamazoo Mill and Former Hawthorne Mill Time-Critical Removal Action
Notice of Completion of Work under Administrative Order on Consent No. V-W-07-C-858

Dear Mr. Fortenberry:

The United States Environmental Protection Agency (U.S. EPA or "Agency") and Georgia-Pacific Corporation (now Georgia-Pacific LLC) entered into an Administrative Order on Consent (AOC) on November 16, 2006, pursuant to which Georgia-Pacific LLC (GP) agreed to perform a time-critical removal action at the GP Kalamazoo and Former Hawthorne Mills (jointly, "Mill Properties"), and to reimburse U.S. EPA for response costs incurred and paid by the Agency in overseeing the removal action. The GP Kalamazoo Mill, razed in 2007, was located at 2425 King Highway, Kalamazoo, Michigan. The Former Hawthorne Mill was located immediately east of the GP Kalamazoo Mill but has no known address.

The time-critical removal action addressed an imminent and substantial threat to human health and the environment presented by the potential release of hazardous substances from waste disposal areas located at the Mill Properties. Under the terms of the AOC and the work plan attached to the AOC as Appendix 6 (Work Plan), GP agreed to conduct the response activities which U.S. EPA had determined, in an Action Memorandum dated November 27, 2006, were necessary to address the threats to human health and the environment at the Mill Properties. These response actions included the following activities:

1. Excavation and disposal of all waste material in the Refuse Area in accordance with the performance standards specified in the Action Memorandum and the Work Plan;
2. Excavation and disposal of all waste material in the Oxbow Area in accordance with the performance standards specified in the Action Memorandum and the Work Plan;

3. Characterization, as specified in the Work Plan, of the waste material in the Refuse Area to determine whether such waste material was compatible, for disposal purposes, with the polychlorinated biphenyl (PCB) contaminated wastes then located in the A-Site Landfill, and whether disposal of the waste material in the A-Site Landfill was consistent with U.S. EPA's Proposed Plan for OU2 of the Allied Paper/Portage Creek/Kalamazoo River Site (OU2 is comprised of Willow Boulevard Landfill and A-Site Landfill); and
4. Disposal of waste material in the A-Site Landfill, or as appropriate, off-Site.

Through subsequent modifications to the Work Plan, U.S. EPA required, and GP agreed to conduct, the following, additional response activities:

1. Preparation and implementation of a Health and Safety Plan;
2. Preparation of a Sampling Analysis Plan Addendum;
3. Preparation of a Quality Management Plan;
4. Preparation of a Post-Removal Site Control Plan;
6. Preparation of a list of applicable or relevant and appropriate requirements that may be achieved to the extent practicable;
7. Restoration of Refuse Area as floodplain area;
8. Excavation, characterization and appropriate disposal of visibly stained soil at the Transformer Pad Area;
9. Excavation, characterization and appropriate disposal of Wastewater Pipeline Area; and
10. Excavation, characterization and appropriate disposal of the Underground Pipe.

GP's contractor, Arcadis, mobilized into the field on November 27, 2006. Removal activities continued through the spring, and a final inspection was conducted on July 11, 2007. On September 7, 2007, Arcadis, on behalf of GP and pursuant to Paragraph 20 of the AOC, submitted a Final Report on the response activities completed as part of the time-critical removal action at the Mill Properties.

Based on my oversight of the removal activities conducted by GP at the Mill Properties, and my review of the Final Report, I conclude that GP has completed the work (with the exception of obligations associated with post-removal site control, payment of future response costs, and record retention) required by the AOC.

Accordingly, you are hereby notified pursuant to Section XXVI of the AOC that U.S. EPA has determined that the work required by the AOC (with the exception of obligations associated with post-removal site control, payment of future response costs, and record retention) has been completed. You should be aware that U.S. EPA intends in the near future to send a final oversight bill to GP. This Notice of Completion does not release GP from any potential future

obligation to perform additional work to address the same, or other, conditions at the Mill Properties.

Please contact me at (312) 886-1434 or Eileen Furey, Associate Regional Counsel, at (312) 886-7950 if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sam Chummar', with a stylized flourish extending from the bottom.

Sam Chummar, Remedial Project Manager
U.S. EPA Region 5
Superfund Division – Remedial Response Branch #1
77 W Jackson Blvd. (SR-6J)
Chicago, IL 60604

cc: Eileen Furey (C-14J)
James Saric (SR-6J)
Michael Berkoff (SR-6J)
Carol Ropski (SE-5J)
Keith Krawczyk, MDEQ
Paul Bucholtz, MDEQ
Patrick McGuire, Arcadis